

EXHIBIT A

From: [Larakers, Mary L. \(CIV\)](#)
To: [Trina Realmuto](#); matt@nwirp.org
Cc: [Kristin Macleod-Ball](#); hughesa@humanrightsfirst.org; [Perez, Elianis \(CIV\)](#); [Seamon, Matthew \(CIV\)](#)
Subject: RE: DVD v. DHS (D. Mass.) - Plaintiff O.C.G.
Date: Friday, May 16, 2025 9:46:20 PM
Attachments: [image001.png](#)

Hi Trina,

The amended discovery responses are attached.

I have not heard back from ICE regarding your request that they facilitate OCG return to the United States.

From: Trina Realmuto <trina@immigrationlitigation.org>
Sent: Friday, May 16, 2025 3:49 PM
To: Larakers, Mary L. (CIV) <Mary.L.Larakers@usdoj.gov>; matt@nwirp.org
Cc: Kristin Macleod-Ball <Kristin@immigrationlitigation.org>; hughesa@humanrightsfirst.org; Perez, Elianis (CIV) <Elianis.Perez@usdoj.gov>; Seamon, Matthew (CIV) <Matthew.Seamon2@usdoj.gov>
Subject: [EXTERNAL] DVD v. DHS (D. Mass.) - Plaintiff O.C.G.

Hi Mary,

Are Defendants still planning to get the corrections on file today before the court closes at 5pm?

Also, is DHS amenable to immediately facilitating O.C.G.'s return?

If we do not hear back on DHS' position on return by midnight, please treat this email and the one from Matt yesterday as a good faith effort to resolve this issue pursuant to Local Rule 7.1(a)(2) because we will prepare a motion for a TRO seeking O.C.G.'s return.

Thanks,

Trina



From: Larakers, Mary L. (CIV) <Mary.L.Larakers@usdoj.gov>
Sent: Thursday, May 15, 2025 6:39 PM
To: matt@nwirp.org
Cc: Trina Realmuto <trina@immigrationlitigation.org>; Kristin Macleod-Ball <Kristin@immigrationlitigation.org>; hughesa@humanrightsfirst.org; Perez, Elianis (CIV) <Elianis.Perez@usdoj.gov>; Seamon, Matthew (CIV) <Matthew.Seamon2@usdoj.gov>
Subject: Re: [EXTERNAL] RE: DVD Protective Order

Hi Matt,

Yes, it is our intention to get those corrections on file tomorrow. I will have to pass the second question along to DHS.

On May 15, 2025, at 5:55 PM, Matt Adams <matt@nwirp.org> wrote:

Hi Mary,

Can you please notify the Court by tomorrow with these corrections? And in light of this information are Defendants now willing to immediately facilitate the return of O.C.G.?

Matt

On Thu, May 15, 2025 at 2:37 PM Larakers, Mary L. (CIV) <Mary.L.Larakers@usdoj.gov> wrote:

Counsel,

After further investigation, ICE cannot identify the officer who gave O.C.G. notice that he was being removed to Mexico when he was outside the detention center as stated in O.C.G.'s declaration (ECF No. 8-4). ICE has not found any officer who remembers such an interaction with O.C.G specifically. Nor can ICE confirm that any officer asked O.C.G. if he had a fear of return to Mexico. I know this conflicts with representations Defendants have made to the Court and we are working on a filing to correct those representations. We are also working on amended responses to the written discovery. Given this information, we no longer have a deponent for tomorrow's deposition and have to cancel the deposition.

Best,
Mary

On May 8, 2025, at 7:01 PM, Trina Realmuto <trina@immigrationlitigation.org> wrote:

Hi Mary,

Thank you for the information about Mr. [REDACTED] We will be in touch with video link information.

Attached please find Plaintiffs' edits to the protective order and clawback agreement.

Thanks,
Trina



From: Larakers, Mary L. (CIV) <Mary.L.Larakers@usdoj.gov>
Sent: Thursday, May 8, 2025 3:33 PM
To: Trina Realmuto <trina@immigrationlitigation.org>
Cc: matt@nwirp.org; Kristin Macleod-Ball
<Kristin@immigrationlitigation.org>; hughesa@humanrightsfirst.org; Perez, Elianis (CIV) <Elianis.Perez@usdoj.gov>; Seamon, Matthew (CIV)
<Matthew.Seamon2@usdoj.gov>
Subject: Re: [EXTERNAL] RE: DVD Protective Order

Hi Trina,

The deponent is available May 16 for the deposition and is amenable to doing the deposition by zoom. His name is [REDACTED]. He is a deportation officer in Eloy, Arizona.

On May 8, 2025, at 12:51 PM, Trina Realmuto <trina@immigrationlitigation.org> wrote:

Mary,

Apologies for the delayed acknowledgement of receipt. We are reviewing and will circle back later today.

Thanks, Trina



From: Larakers, Mary L. (CIV)
<Mary.L.Larakers@usdoj.gov>

Sent: Wednesday, May 7, 2025 8:19 PM
To: Trina Realmuto <trina@immigrationlitigation.org>
Cc: matt@nwirp.org; Kristin Macleod-Ball
<Kristin@immigrationlitigation.org>;
hughesa@humanrightsfirst.org; Perez, Elianis (CIV)
<Elianis.Perez@usdoj.gov>; Seamon, Matthew (CIV)
<Matthew.Seamon2@usdoj.gov>
Subject: DVD Protective Order

Hi Trina,

Please see attached a draft protective order and 502(d) for your review. We hope this protective order can form the basis for the compliance discovery protective order. But, this is just for the OCG discovery for now.

Thanks,
Mary

Mary L. Larakers
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<image003.jpg>

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<DVD 502(d) Order_v1 - Pls edits.docx>
<DVD Protective Order_v2 - Pls edits.docx>

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